

SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION

In re:

CATSKILL DISTILLING COMPANY, LTD.,

Debtor.

Case No. 19-36861-cgm
(Chapter 11)

OBJECTION TO NOTICE OF PROPOSED ORDER

Jeff Bank, by its attorneys Hodgson Russ LLP, objects to the Debtors presentments of a proposed order amending this courts February 12, 2020 scheduling order and alleges:

1. Jeff Bank is a secured creditor of the debtor owed in excess of \$2.5 million including post-petition interest.
2. Jeff Bank has filed a motion to convert this proceeding from chapter 11 to Chapter 7. The motion is returnable June 16, 2020 and is filed on the docket a (85) notice of motion and (84) motion.
3. Jeff bank adopts and incorporates all of its basis for conversion, as set out in its motion, as its opposition to the presentment of an Order extending the debtor's time to file a plan to July 20, 2020 and seeks whatever additional relief the court deems just and proper.

DATED: Albany, New York
May 18, 2020

HODGSON RUSS LLP
Attorneys for Jeff Bank

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